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7	CROSS LINK, INC.		
8	dba WESTAR MARINE SERVICES		
9			
0	UNITED STATES DISTRICT COURT		
1	NORTHERN DISTRICT OF CALIFORNIA		
2	SAN FRANCISCO DIVISION		
3	ROBERT GOLDSWORTHY,)	Case No.: C 06-4025 MHP	
4)	
l5 l6	Plaintiff,) vs.)	STIPULATION TO CONTINUE MEDIATION COMPLETION DEADLINE; PROPOSED ORDER THEREON	
17	Tutor-Saliba/Koch/Tidewater JV, Westar		
18	Marine Services, Cross Link, Inc., and DOES 1-) 10, <i>in personam</i> , and M/V PROWLER & M/V) 	
19	ROVER, their engines, tackle, apparel, furniture, etc., <i>in rem</i> ,) 	
20			
21	Defendants)		
22	Plaintiff Robert Goldsworthy, defendant (Cross Link, Inc. dba Westar Marine Services, and	
23	defendant Tutor-Saliba/Koch/Tidewater, JV, by and through their respective counsel of record,		
24	hereby stipulate to and respectfully request the court enter an Order continuing the deadline for		
25	completing mediation, as more particularly set forth below and for the reasons stated herein.		
26	On November 27, 2006, at the initial Case Management Conference, the Court ordered the		
27	parties to complete private mediation by May 31, 2007. Since then, the parties have engaged in		
28	substantial written discovery including interrogatories and document requests, and have subpoenae		
		1	
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STIPULATION TO CONTINUE MEDIATION COMPLETION DEADLINE; [PROPOSED] ORDER THEREON

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1 records from third parties, including medical providers. Hundreds of pages of documents have been 2 produced and are being reviewed. Similarly, hundreds of pages of medical records pertaining to 3 plaintiff have been subpoenaed and are currently being analyzed. The deposition of plaintiff is 4 scheduled for June 23, 2007 to allow sufficient time to complete necessary pre-deposition 5 discovery. The depositions of treating doctors will follow thereafter. 6 The parties agree and respectfully suggest that completion of this discovery, including the 7 aforementioned depositions, is necessary in order for there to be a useful mediation. The parties 8 therefore also agree and respectfully suggest that for these reasons, a continuance of the mediation 9 completion date of about 90 days is reasonably necessary and is supported by good cause. 10 THEREFORE, plaintiff and defendants hereby stipulate to continue the date for completion 11 of mediation from May 31, 2007 to September 14, 2007. 12 Accordingly, plaintiff and defendants hereby respectfully request that the Court continue the 13 mediation completion date as suggested above. 14 IT IS SO STPULATED: 15 16 Dated: STERLING & CLACK Rex M. Clack 17 David E. Russo 18 19 By: 20 Rex M. Clack Attorneys for Defendant, 21 CROSS LINK, INC. dba 22 WESTAR MARINE SERVICES 23 24 25 26 27 28

1	Dated:	BANNING MICKLOW & BULL, LLP	
2			
3	By:	/S/	
4		Edward M. Bull III	
5		Attorneys for Plaintiff ROBERT GOLDSWORTHY	
6			
7	Dated:	COX, WOOTTON, GRIFFIN, HANSEN &	
8	Dated.	POULOS, LLP	
9			
10	By:	/S/	
11		Galin Luk Attorneys for Defendant	
12 13		TUTOR-SALIBA/KOCH/TIDEWATER JV	
14			
15			
16	I, Galin G. Luk, hereby attest that counsel for defendant Westar and counsel for		
17	plaintiff Robert Goldsworthy have authorized me to conform their signature to this		
18	efile.	•	
19			
20			
21		By: <u>/S/</u> Galin Luk	
22		Attorneys for Defendant	
23		TUTOR-SALIBA/KOCH/TIDEWATER JV	
24			
25			
26			
27			
28			
	3		
- 1	STIPULATION TO CONTINUE MEDIATION COMPLETION Case No. C 06-4025 MHP		

810026/P/StipConMed

ORDER

Having reviewed and considered the parties' request and stipulation to continue the date for completion of mediation, and good cause appearing therefor,

IT IS HEREBY ORDERED:

The date for completion of meditation is continued from May 31, 2007 to September 14, 2007.

Dated: May 25, 2007

